

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ERIKA WILSON,

Plaintiff,

Case No.: 1:24-cv-4108-ALC

- against -

DECLARATION

SELIP & STYLIANOU, LLP; J & E PROCESS
SERVERS; and BENJAMIN LAMB.

Defendants.
-----X

SARAH PRAGER, pursuant to 28 U.S.C. § 1746, declares under penalties of perjury as follows:

1. I am a partner with the law firm of Gordon Rees Scully Mansukhani, LLP, counsel for Defendant Benjamin Lamb (“Lamb”) in the above-referenced action. I am an attorney duly admitted to practice before the United States District Court for the Southern District of New York. From my review of the case file and work on this matter, I have personal knowledge of the facts and circumstances set forth herein.

2. I submit this declaration, its exhibits attached hereto, and the accompanying memorandum of law, in support of Lamb’s motion to dismiss the First Amended Complaint (“FAC”) of Plaintiff Erika Wilson (“Plaintiff”), with prejudice, pursuant to Fed. R. Civ. P. 12(b)(1) and (6), together with such other and further relief as this Honorable Court deems just and proper.

3. Attached hereto as Exhibit “A” is a true and correct copy of the Stipulation of Discontinuance, dated June 3, 2024, filed in the action titled *Synchrony Bank v. Erika N. Wilson*, Index No. CV-005361-23/BX (the “Underlying Action”).

WHEREFORE, Defendants respectfully request that this motion be granted in its entirety, together with such other and further relief as this Honorable Court deems just and proper.

Dated: New York, New York
August 8, 2025

**GORDON REES SCULLY
MANSUKHANI, LLP**

By: /s/ *Sarah Prager*
Sarah Prager, Esq.
Joseph Salvo, Esq.
Attorneys for Defendant
BENJAMIN LAMB
One Battery Park Plaza, 28th Floor
New York, NY 10004
(212) 269-5500
sprager@grsm.com
jsalvo@grsm.com